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September 10, 2015

VIA ECF

Hon. Robert M. Levy
Magistrate Judge
United States District for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: Campbell v. Ganguly, No. 14-cv-00188 (E.D.N.Y)

Dear Magistrate Levy:

This firm represents Plaintiffs James Campbell and Kevin Rudolf in this action. Pursuant to this Court's order dated June 12, 2015, we write with Defense counsel's consent to update the Court on the status of the forfeiture proceeding currently pending in the related criminal action, *U.S. v. Ganguly*, No. 14-cr-00123 (S.D.N.Y.) (the "Forfeiture Proceeding").

As Your Honor may recall from our prior status update on June 12, 2015 [D.I. 34], there were two open issues in the Forfeiture Proceeding that warranted staying this action: (i) the unresolved motion to dismiss a petition brought by another of Ms. Ganguly's victims, which alleged superior claims to a bank account containing more than \$2 million that had been otherwise forfeited and earmarked for victim compensation; and (ii) the extension of the deadline to sell Ms. Ganguly's property on Staten Island until August 1, 2015.

Since our last update to Your Honor, the Parties have monitored the docket in the Forfeiture Proceeding, and Plaintiffs have spoken on several occasions with the AUSA charged with overseeing the government's victim restitution efforts. However, in the past three months there have been no substantive developments in the Forfeiture Proceeding on either of these two issues. The court has neither scheduled oral argument nor decided the pending motion to dismiss, and we understand that the Staten Island property remains unsold.

Given that the Forfeiture Proceeding remains pending with the same issues unresolved, the Parties respectfully request that, pursuant to the Court's order of June 12, 2015, this action remain stayed for an additional 90-day period. During this time, the Parties will continue to monitor the Forfeiture Proceeding and will confer in order to provide a further status update to this Court on or before December 11, 2015.

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Counsel for Plaintiffs and Defendants are available at Your Honor's convenience to discuss their joint request, or any other matter.

Respectfully Submitted,



Brian E. Maas

cc: Mark K. Anesh, Esq. (via ECF)